

Pro Se 6 (Rev. 12/16) Complaint for a Civil Case Alleging that the Defendant Owes the Plaintiff a Sum of Money

## UNITED STATES DISTRICT COURT

for the

Western District of Arkansas

\_\_\_\_ Civil \_\_\_\_ Division

US DISTRICT COURT  
WESTERN DISTRICT OF ARKANSAS  
FILED

FEB - 1 2019

DOUGLAS F. YOUNG, Clerk  
By  
Deputy Clerk

JOHN M. LEATO &amp; LAURINA T. LEATO

Case No.

19-5020-TLB

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

WESTERN UNION HOLDINGS, INC.

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

**COMPLAINT FOR A CIVIL CASE ALLEGING THAT THE  
DEFENDANT OWES PLAINTIFF A SUM OF MONEY**  
(28 U.S.C. § 1332; Diversity of Citizenship)

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	JOHN M. LEATO & LAURINA T. LEATO
Street Address	890 CHOATE PLACE CIR.
City and County	PEA RIDGE (BENTON)
State and Zip Code	ARKANSAS 72751-2971
Telephone Number	(479) 488-6377 & (260) 750-3863
E-mail Address	LAURINA.LEATO@AOL.COM

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

## Defendant No. 1

Name	LINDA K. HUNDON, Esq.
Job or Title <i>(if known)</i>	SR. MANAGER, LITIGATION
Street Address	12510 E.BELFORD AVENUE M21A2
City and County	ENGLEWOOD, (ARA PAHOE COUNTY).
State and Zip Code	COLORADO 80112
Telephone Number	720-332-5223
E-mail Address <i>(if known)</i>	L.HUNDON@WESTERNUNION.COM

## Defendant No. 2

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

## Defendant No. 3

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

## Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Under 28 U.S.C. § 1332, federal courts may hear cases in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000. In that kind of case, called a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff. Explain how these jurisdictional requirements have been met.

**A. The Plaintiff(s)**

1. If the plaintiff is an individual

The plaintiff, (name) JOHN M. LEATO & LAURINA T. LEATO, is a citizen of the  
State of (name) ARKANSAS.

2. If the plaintiff is a corporation

The plaintiff, (name) \_\_\_\_\_, is incorporated  
under the laws of the State of (name) \_\_\_\_\_,  
and has its principal place of business in the State of (name) \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**B. The Defendant(s)**

1. If the defendant is an individual

The defendant, (name) \_\_\_\_\_, is a citizen of  
the State of (name) \_\_\_\_\_. Or is a citizen of  
(foreign nation) \_\_\_\_\_.

2. If the defendant is a corporation

The defendant, (name) WESTERN UNION HOLDINS, INC, is incorporated under  
the laws of the State of (name) COLORADO, and has its  
principal place of business in the State of (name) ARAPAHOE COUNTY- COLORADO.  
Or is incorporated under the laws of (foreign nation) \_\_\_\_\_,  
and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

**C. The Amount in Controversy**

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

**WESTERN UNION COMPANY OWES US FOR 8 FRAUD INDUCED WIRE TRANSFERS FROM 01/12/2008 TO 03/26/2009 TOTALING \$18,750.00. (EXHIBIT A). IN ADDITION, TWO COUNTS OF I.D. THEFT FRAUD VICTIMIZATION BROUGHT ON VIA EXPOSURE TO SCAMMERS AND IMPOSTER'S FOUND IN THE WESTERN UNION FIASCO 03/2008-03/2018. (EXHIBIT B). FAILED TO COMPLY**

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

The defendant, (name) WESTERN UNION HOLDINGS, INC, owes the plaintiff (specify the amount) \$ 18,750.00, because (use one or more of the following, as appropriate):

#### A. On a Promissory Note

On (date) \_\_\_\_\_, the defendant signed and delivered a note promising to pay the plaintiff on (date) \_\_\_\_\_ the sum of (specify the amount) \$ \_\_\_\_\_ with interest at the rate of (specify the amount) \_\_\_\_\_ percent. The defendant has not paid the amount due and owes (state the amount of unpaid principal and interest) \$ \_\_\_\_\_. A copy of the note is attached as an exhibit or is summarized below. (Attach the note or summarize what the document says.)

#### B. On an Account Between the Parties

The defendant owes the plaintiff (specify the amount) \$ \_\_\_\_\_. This debt arises from an account between the parties, based on (state the basis, such as an agreement between a credit-card company and a credit-card holder)

The plaintiff sent the defendant a statement of the account listing the transactions over a certain period and showing the bills sent, the payments received or credits approved, and the balance due. The defendant owes (specify the amount) \$ \_\_\_\_\_. Copies of the bills or account statements are attached as exhibits or summarized below. (Attach the statements or summarize what they say.)

Paragraph II

Item C continued

WESTERN UNION COMPANY OWES US FOR 8 FRAUD INDUCED WIRE TRANSFERS FROM 01/12/2008 TO 03/26/2009 TOTALING \$18, 750.00. (EXHIBIT A). IN ADDITION TWO COUNTS OF I.D. THEFT FRAUD VICTIMIZATION BROUGHT ON VIA EXPOSURE TO SCAMMERS AND IMPOSTER'S FOUND IN THE WESTERN UNION FIASCO 03/2008-03/2018. (EXHIBIT B). FAILED TO COMPLY WITH BANKRUPTCY COURT ORDER CASE NO.17-1212-6 TO PAY OUR CLAIM ACTUAL LOSSES BUT PUNITIVE ONES NOT WESTERNUNIONREMISSION.COM FOR \$30, 000,000.00 (30 MILLION) IN DAMAGES (EXHIBIT C.)

**C. For Goods Sold and Delivered**

The defendant owes the plaintiff *(specify the amount)* \$ \_\_\_\_\_, for goods sold and delivered by the plaintiff to the defendant from *(date)* \_\_\_\_\_ to *(date)* \_\_\_\_\_.

**D. For Money Loaned**

The defendant owes the plaintiff *(specify the amount)* \$ \_\_\_\_\_, for money the plaintiff loaned the defendant on *(date)* \_\_\_\_\_.

**E. For Money Paid by Mistake**

The defendant owes the plaintiff *(specify the amount)* \$ 30,000,000.00 for money paid by mistake to the defendant on *(date)* 04/12/2008, when the defendant received the payment from *(specify who paid and describe the circumstances of the payment)*

LAURINA T GLAROS-LEATO (VICTIM) PAID IN FRAUDULENT SCAM FROM DATE :04/12/2008-04/12/2018 WHILE USING WESTERN UNION TO SEND 8 FRAUD INDUCED WIRE TRANSFERS.

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**F. For Money Had and Received**

The defendant was paid money *(specify the amount)* \$ \_\_\_\_\_ on *(date)* \_\_\_\_\_ by *(identify who paid and describe the circumstances of the payment)*

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It is unjust for the defendant not to pay the plaintiff the money received because *(explain the reason, such as that the money was intended to be paid to the plaintiff, or was paid by coercion, duress, or fraud, or was an overpayment or a deposit to be returned)*

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**IV. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

WE ARE FINANCIALLY DESTROYED AS A RESULT OF OUR EXPOSURE TO FRAUDULENT ACTIVITIES FROM 03/01/2008 TO TODAY WE BOTH HAVE BEEN A VICTIM OF I.D. THEFT FRAUD. (EXHIBIT D). IN ADDITION, ON 10/31/2017 HAD TO FILE CHAPTER 7 BANKRUPTCY (JOINT) CASE NO.17-1212-6, WESTERN UNION FAILED & IGNORED TRUSTEE REQUESTS, WAS LISTED ON OUR DEBTORS LIST OF VALID CLAIMS FOR \$ 18, 750.00 PLUS DAMAGES OF \$ 30,000,000.00. (EXHIBIT E). DURING THIS FIASCO WESTERN UNION HAS GIVEN US THE RUN AROUND WITH ALL OTHER FAILED CLASS ACTION EFFORTS. ~~LASTLY~~, WESTERN UNION HAS VIOLATED ALL 50 STATES DECEPTIVE PRACTICES ACT, ESPECIALLY ILLINOIS STATE LAW, WHERE THE FRAUD TRANSPIRED OR "ILLINOIS CONSUMER FRAUD AND DECEPTIVE BUSINESS PRACTICES ACT, 815 ILCS 505/1, et seq.(EXHIBIT F). FINALLY, "THE DODD FRANK WALL STREET REFORM AND CONSUMER PROTECTION ACT". TITLE X. (EXHIBIT G).

## V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

### A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 01/29/2019

Signature of Plaintiff

Printed Name of Plaintiff

JOHN M. LEATO-PRO-SE

LAURINA T. LEATO -PRO-SE

### B. For Attorneys

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address